

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**NATHALY CORTEZ, individually and on
behalf of similarly situated individuals**

Plaintiff,

v.

CASA DO BRASIL, LLC,

Defendant.

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Civil Action No.: 4:21-CV-03991

DEFENDANT’S DESIGNATION OF EXPERT WITNESSES

TO THE HONORABLE DISTRICT JUDGE OF SAID COURT:

NOW COMES NOW Defendant Casa do Brasil (“Defendant”), and files this, its Designation of Expert Witnesses, and shows the Court the following:

Ramon D. Bissmeyer
Member and Attorney
c/o Dykema Gossett, PLLC
112 E. Pecan Street, Suite 1800
San Antonio, Texas 78205

Mr. Bissmeyer has not been retained to provide a written report related to the matters identified herein. As a result, and pursuant to FED. R. CIV. P. (a)(2)(C), Defendant discloses that it is anticipated that Mr. Bissmeyer will testify to the necessity and reasonableness, both in hours spent and hourly rate charged, for any attorneys’ fees claimed by either party in this case. Mr. Bissmeyer will also serve as a rebuttal witness to Plaintiffs’ designated experts. Mr. Bissmeyer may also testify regarding his background, skill, experience, training and education. Mr. Bissmeyer’s qualifications to testify regarding the matters identified herein are identified on Exhibit A hereto. The issues raised by this case are not novel with respect to either the substantive issues or the procedural issues. While all cases may present a novel procedural or substantive issue, again, this case presents nothing out of the ordinary that would justify the award of additional attorneys’ fees. The total amount involved in a verdict and results obtained are yet to be determined.

Respectfully submitted,

/s/ Ramon D. Bissmeyer

Ramon D. Bissmeyer

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**ATTORNEYS FOR DEFENDANT
CASA DO BRASIL, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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/s/ Ramon D. Bissmeyer

Counsel for Defendant